

1 Cyrus Safa
2 Attorney at Law: 13241
3 12631 East Imperial Highway, Suite C-115
4 Santa Fe Springs, CA 90670
5 Tel: (562)437-7006
6 Fax: (562)432-2935
7 E-Mail: rohlfig.office@rohlfiglaw.com
8 Attorneys for Plaintiff
9 AMANDA K. JOHNSON

7 Leonard Stone
8 Attorney at Law: 5791
9 Shook & Stone, Chtd.
10 710 South 4th Street
11 Las Vegas, NV 89101
12 Tel.: (702)385-2220
13 Fax: (702)384-0394
14 E-mail: kshonfeld@shookandstone.com

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

15	AMANDA K. JOHNSON)	Case No.: 2:18-cv-00621-RFB-CWH
16	Plaintiff,)	STIPULATION TO EXTEND TIME
17	v.)	TO FILE MOTION FOR
18	NANCY A. BERRYHILL,)	REMAND/REVERSAL
19	Acting Commissioner of Social)	(FIRST REQUEST)
20	Security,)	
21	Defendant.)	
22)	
23)	
24)	
25)	
26)	

22 Plaintiff Amanda K. Johnson and Defendant Nancy A. Berryhill, Acting
23 Commissioner of Social Security, through their undersigned attorneys, stipulate,
24 subject to this court's approval, to extend the time from September 7, 2018 to
25 November 16, 2018 for Plaintiff to file a Motion for Remand/Reversal, with all
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1 other dates in the Court's Order Concerning Review of Social Security Cases
2 extended accordingly. This request is made at the request of Plaintiff's counsel due
3 to an abnormally heavy motion caseload and hearing travel schedule in the
4 upcoming weeks. Counsel has taken internal measures to decrease its caseload to
5 ensure this type of request is not needed in the future. Plaintiff request additional
6 time to fully research the issues presented.

7 Counsel sincerely apologizes to the court and its staff for any inconvenience
8 this may have had.

9 DATE: September 7, 2018

Respectfully submitted,

10 LAWRENCE D. ROHLFING

11 /s/ *Cyrus Safa*

12 BY:

Cyrus Safa

13 Attorney for plaintiff Mr. Amanda K. Johnson

14
15 DATE: September , 2018

DAYLE ELIESON

16 United States Attorney

17
18 /s/ *Tina Naicker*

19 BY:

Tina Naicker

20 Special Assistant United States Attorney

21 Attorneys for defendant Nancy A. Berryhill

22 |*authorized by e-mail|

23 DATED: September 11, 2018

24 IT IS SO ORDERED:

25 UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**
2 **FOR CASE 2:18-CV-00621-RFB-CWH**

3 I hereby certify that I electronically filed the foregoing with the Clerk of the
4 Court for this court by using the CM/ECF system on September 7, 2018

5 I certify that all participants in the case are registered CM/ECF users and
6 that service will be accomplished by the CM/ECF system.

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8 */s/ Cyrus Safa*

9 _____
10 Cyrus Safa
11 Attorneys for Plaintiff
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